

**TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.**

ATTORNEYS AT LAW  
40 EXCHANGE PLACE  
18TH FLOOR  
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE  
(212) 482-1303 FAX  
WWW.TALKINLAW.COM  
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:  
5100 DORSEY HALL DRIVE  
SUITE 100  
ELLICOTT CITY, MD 21042  
410-964-0300

NEW JERSEY OFFICE:  
2500 PLAZA 5  
HARBORSIDE FINANCIAL CENTER  
JERSEY CITY, NJ 07311  
201-342-6665

June 27, 2022

Honorable Colleen McMahon  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

BY ECF

Re: United States v. James Cahill  
20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill"), now 73 years old, has been on pretrial release for 20 months pursuant to a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring. Cahill has been compliant with all conditions of release during the lengthy period of his pretrial release. By this letter, and with the consent of the government, by Assistant United States Attorney Jason Swergold, and Pretrial Services ("PTS"), by United States Pretrial Service Officer Andrew Abbott, Cahill respectfully requests that the home detention condition of his release be replaced by a curfew condition. The curfew time will be determined by PTS and all other conditions of release will remain in effect.

Thank you for Your Honor's consideration of this request.

Very truly yours,

*Sanford Talkin*  
Sanford Talkin

cc: AUSA Jason Swergold  
AUSA Jun Xiang (by ECF)  
AUSA Danielle Sassoon (by ECF)  
SAUSA Laura de Oliveira (by ECF)  
USPTO Andrew Abbott (by email)